

REMARKS

In the Office Action mailed December 13, 2004, the Examiner rejected all of the pending claims 1-8. The Examiner's rejections are traversed below.

REJECTION UNDER 35 U.S.C. § 102

The Examiner has rejected claims 1,2,4,5,7 and 8 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,427,176 B1, issued to Berglund *et al.* (hereinafter Berglund).

Berglund teaches a system having subsystems in which configuration labeling information is stored therein. The system detects subsystem configuration and updates the stored configuration labeling information based on the detection. See Berglund, column 12, lines 50-56.

The present invention, as defined by independent claims 1, 4, and 7, is directed to a peripheral unit management system that manages a plurality of peripheral units, for example, a plurality of printers, using a peripheral unit manager. The peripheral unit manager stores property information, for example, a printer serial number, that corresponds to address information, for example, a Media Access Control Address (MAC) of a card or board in the printer.

When replacement of a unit occurs, the unit manager stores both the new property information and the new address information in its records. If, however, the unit manager detects that only the address information for the peripheral unit has changed, for example, when a printer card has been replaced, the unit manager simply reuses information that it has, that is, data that was previously accumulated by the peripheral unit with the new address of the replacement card.

This feature is recited in the below emphasized language of claim 1, for example, as:

*. . . when the **property information read does not coincide with the property information stored** in the peripheral unit manager, **storing the property information read and the new address information** of the one of the peripheral units, or when the **property information read does coincide with the property information stored** in the peripheral unit manager, **storing data being accumulated in for the peripheral unit with the new address information** after setting the property information to correspond to the new address [emphasis added].*

Applicant respectfully submits that the claims of the present invention are not anticipated by Berglund, as Berglund does not disclose each and every feature of the claims. For example, Berglund fails to disclose the features of the present invention, as identified by the emphasized language of the claims.

In particular, in the system of the present invention, when the property information read from the peripheral does not match the property information stored in the unit manager, the system stores both the property information read and the new address information. In contrast, in Berglund, if a part number of a subsystem does not match a part number stored in a table (indication of a new device), either the IPL (initialization) is terminated and an error message is posted, or the IPL is paused while service personnel replace the required labeling if a labeling change is required. Otherwise, if no label change is required, the new part number is written into a table. Unlike the present invention, however, Berglund does not disclose storing address information. See Berglund, column 11, lines 10-11 through line 32. Applicants submit that merely writing a part number into a table is not tantamount to storing new address information.

In the present invention, the unit manager stores data that was previously accumulated in the peripheral unit with the new address data when the property information read matches the property information stored. In contrast, according to our understanding of Berglund, when the read information matches the stored information, that is, when no new part number is detected, the IPL simply continues. Berglund does not disclose information relating to storing any information in this case. See Berglund, column 11, lines 7-10.

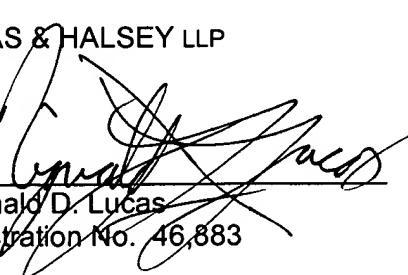
It is submitted that the claims satisfy the requirements of 35 U.S.C. § 102. It is further submitted that the claims are not taught, disclosed or suggested by the prior art. The claims are therefore in a condition suitable for allowance. An early Notice of Allowance is requested.

If any further fees, other than and except for the issue fee, are necessary with respect to this paper, the U.S.P.T.O. is requested to obtain the same from deposit account number 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

By:


Reginald D. Lucas
Registration No. 46,883

Date: 3/14/05

1201 New York Ave, N.W., Suite 700
Washington, D.C. 20005
Telephone: (202) 434-1500
Facsimile: (202) 434-1501